

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

RICHIE RIDDLE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:22-cv-00039-SEB-TAB
)	
FERGUSON CONSTRUCTION CO.)	
- INDIANA,)	
)	
Defendant.)	

PLAINTIFF'S PRELIMINARY WITNESS & EXHIBIT LIST

Plaintiff, Richie Riddle, by counsel, respectfully submits the following lists of witnesses and exhibits that he may rely upon at the trial of this matter other than witnesses and exhibits that will be used solely for purposes of impeachment or rebuttal.

I. WITNESSES

1. Plaintiff
2. Clay Smith
3. Duane Deal
4. Spencer Randall
5. Jane Robison
6. Greg Sutton
7. Tom Bergman
8. Brad Sharp
9. Gary Engleking,
10. Jason Lindeman

11. Brad Sharp
12. Joe Bastian
13. Scott Dunham
14. Wes Walker
15. Garrett Acton
16. Darrien Nickerson
17. Plaintiff may rely upon similarly-situated employees for Defendant's treatment of them;
18. All persons identified in Defendant's initial disclosures and Defendant's Witness Lists; and
19. Individuals identified through further investigation or discovery.

In the event that it is subsequently determined that other or additional witnesses will be called by Plaintiff, other than for purposes of impeachment or rebuttal, Defendant will be so advised. Plaintiff hereby reserves the right to add to or otherwise amend this list of witnesses for any appropriate reason.

II. EXHIBITS

1. Documents regarding Plaintiff's employment and performance at Defendant;
2. Documents regarding Defendant's decision to terminated Plaintiff;
3. Documents produced to and/or received from the Equal Employment Opportunity Commission relating to Plaintiff's Charges of Discrimination;
4. Documents concerning Plaintiff's damages;
5. Documents regarding Plaintiff's disability;
6. Documents regarding Plaintiff's FMLA leave;
7. Documents relating to Defendant's employment policies and procedures;

8. Documents produced by Defendant to Plaintiff and/or by Plaintiff to Defendant as part of the discovery process;
9. Documents, including personnel files, of employees similarly situated to Plaintiff.
10. Documents identified in Defendant's initial disclosures or Defendant's exhibit lists.

In the event that it is subsequently determined that other or additional exhibits will be offered by Plaintiff, other than for purposes of impeachment or rebuttal, Defendant will be so advised. Plaintiff hereby reserves the right to add to or otherwise amend this list of exhibits after the completion of Discovery or for any appropriate reason.

Respectfully submitted,
JOHN H. HASKIN & ASSOCIATES

/s/ Paul A. Logan
John H. Haskin
Paul A. Logan
Attorneys for Plaintiff, Richie Riddle

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2022, the foregoing document was filed electronically. Notice of this filing will be sent to counsel by operation of the Court's electronic filing system.

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s/ Paul A. Logan
Paul A. Logan

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